

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHEASTERN DIVISION**

ERICA MARIE CAGLE,)
)
Plaintiff,)
v.) **CIVIL ACTION NO.:**
) **5:18-CV-00201-AKK**
)
MADISON COUNTY, ALABAMA; et al.,)
)
Defendants.)

NOTICE OF HEARING

Plaintiff and Defendants have conferred on multiple occasions via telephone, in person at depositions, via formal correspondence and via email. Many discovery issues have been cooperatively resolved, and the pursuit of some information has been abandoned by the plaintiff, or the information sought has been obtained from alternative sources. Nonetheless, the parties acknowledge that certain discovery issues remain unresolved, and despite a good faith attempt, an agreement cannot be reached on the issues listed herein:

I. Unresolved Issue: Production of pertinent files from the Sheriff, specifically, but not limited to, 201 files, training files, investigation files, and desk files, as requested in Plaintiff's Requests for Production Nos. 5, 6, 7 and 8, and Plaintiff's Second Requests for Production No. 1.

II. Unresolved Issue: Production of documents from the Sheriff pertaining or relating to alleged sexual comments, sexual innuendo, misconduct of a sexual nature, sexual harassment, sex discrimination or retaliation for opposing or participating in a complaint about sexual comments, sexual innuendo, misconduct of a sexual nature, sexual harassment, sex discrimination, specifically, but not limited to, complaints, investigations, writeups or written counseling pertaining or related to violations such as rudeness, conduct unbecoming or other categories of disciplinary offenses under which a complaint, which should have been fairly understood as a complaint of sexual harassment, hostile environment, sex discrimination or retaliation, may have been alternatively categorized for investigation or disciplinary purposes, as requested in Plaintiff's Request for Production Nos. 9 and 12.

III. Unresolved issue: Production of pertinent files from the Sheriff and the County, specifically, but not limited to, insurance policies and benefit plans under which the Sheriff's employees and the County employees are eligible to be covered, which appear to all be owned or sponsored by the Madison County Commission as requested in Plaintiff's Interrogatory to the Sheriff No. 2, Plaintiff's Request for Production to the Sheriff No. 20, and Plaintiff's Requests for Production to the County Nos. 1, 18, 19.

A hearing on this matter is set on October 30, 2020, at 3:30 p.m.

/s/Kerri Johnson Riley
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Grace Graham
J. Bentley Owens, III
Ellis, Head, Owens, Justice & Arnold
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Columbiana, Alabama 35051
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This the 23rd day of October, 2020

s/Kerri Johnson Riley
Kerri Johnson Riley